REMARKS

Independent claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodman in view of Franz, Liebenow, and Duffield. Claim 1 has been amended to call for a pointing device that is operable during a text entry mode, and a controller to change a characteristic of a cursor of the pointing device to avoid inadvertent interruption of text entry in the text entry mode. It is respectfully submitted that none of Goodman, Franz, Liebenow, or Duffield teach or suggest, alone or in combination, all of the limitations of amended claim 1.

For example, Goodman fails to disclose a controller that specifically recognizes a text entry mode. Generally in Goodman, if a special function key is not depressed, his keyboard controller sends conventional data identifying the depressed key to the CPU without any additional assessment. Column 5, lines 35-58. However, if the special function key is depressed, Goodman's keyboard controller interprets the keystroke further. *Id.* Goodman's keyboard controller is structured this way to avoid the need for a specialized mouse driver. *See, e.g.,* column 4, lines 3-6 and 23-27; column 6, lines 1-10; column 7, lines 56-65. As such, it is respectfully submitted that Goodman's keyboard controller does not expressly recognize entry into a text entry mode.

Additionally, Goodman does not exercise control over a cursor of a pointing device that is operable during a text entry mode to avoid inadvertent interruption of text entry in the text entry mode. In other words, control over a pointing device cursor in Goodman is a result of using the special function key. But, the user has to physically stop typing to use the special function key and the mouse keys to move the cursor. *See, e.g.,* Figure 1. Thus, Goodman's pointer is not functional unless a special key is pressed, which occurs apart from text entry. For at least these reasons, it is respectfully submitted that Goodman does not disclose a keyboard controller that changes a characteristic of a cursor of an operational pointing device while in a text entry mode. Moreover, Goodman does not even address inadvertent interruption of text entry.

Franz fails to cure the deficiency of Goodman. For example, Franz does not change a characteristic of a cursor of an operable pointing device to avoid inadvertent interruption of text entry in a text entry mode. In particular, the portion of Franz referenced in the Office action deals with pointing events only, not text entry. *See* column 13, line 33-column 14, line 17. As such, the examiner has not shown that Franz cures the deficiencies of Goodman.

Liebenow also fails to cure the deficiency of Goodman. Specifically, Liebenow's mouse driver ignores a single tap actuation of a touch pad when a disabling event has occurred. *See* paragraphs 26, 29, and 33. As Liebenow ignores the single tap actuation, the touch pad effectively does not operate when a disabling event has occurred. Thus, Liebenow fails to cure the deficiency of Goodman.

Additionally, there is no suggestion or motivation to modify Goodman in view of Liebenow. For example, Liebenow's mouse driver is specialized to ignore the single tap actuation after the occurrence of a disabling event. Paragraph 10. However, Goodman's keyboard controller sends data to a conventional mouse driver. *See* Abstract. As such, the references teach away from their combination.

Duffield too fails to cure the deficiency of Goodman. For example, Duffield is relied on in the Office action as teaching moving a cursor to a pre-selected area on a display device. In the Office action, the provided motivation to modify Goodman is that it would allow a user to enter a text label and using the label allows the user to tune specific TV channels. It is respectfully submitted that this motivation appears to be the result of inappropriate hindsight reasoning in view of the applicant's disclosure. For example, Goodman has nothing to do with TV tuning or text labels that allow tuning. Thus, the applicability of Duffield is questioned. Moreover, to the extent that Duffield does apply, the cursor is displayed in a portion of a display that is exactly where the text is to be entered. *See, e.g.,* Figures 3d and 3e; column 4, lines 43-46. Taken together, there is no suggestion or motivation to modify Goodman in view of Duffield.

In sum, all of the limitations of amended claim 1 are not taught or suggested by Goodman, Franz, Liebenow, or Duffield. Moreover, there is no suggestion or motivation to modify Goodman at least in view of Liebenow or Duffield. Thus, amended claim 1 is not obvious. For at least the same reasons claims dependent on claim 1 are also not obvious.

Under a similar analysis, amended claim 10 and claims dependent thereon are also not obvious over Goodman in view of Franz, Liebenow, or Duffield.

Independent claim 17 was also rejected under 35 U.S.C. § 103(a) as being obvious over Goodman in view of Franz, Liebenow, and Duffield. As amended, claim 17 calls for an article comprising one or more machine-readable storage media containing instructions that when executed enable a processor to move a cursor of a pointing device to a pre-selected area on a display that is away from a text entry area in response to detecting entry into a text entry mode. None of the cited references alone or in combination disclose all of the limitations of amended claim 17.

For example, as explained above, Goodman does not disclose detecting entry into a text entry mode and certainly does not move a cursor of a pointing device in response to detecting the entry into text entry mode. Also, Liebenow's pointer is in text-entry mode when a user moves it over the text entry area. Thus, when the Liebenow's pointer is in text-entry mode, it is not away from the text entry area. *See* paragraph 21. The same holds true for Duffield. *See* Figures 3d and 3e; column 4, lines 43-46.

In the Office action, the examiner relies on Franz as teaching control of a cursor to enable user input without accidental interference from the pointing device. However, this language is not set forth in claim 17. Nevertheless, the cited passages of Franz fail to cure the deficiencies of the other references. For example, the first cited passage relates to pointing events only. Column 13, line 62-column 14, line 4. The second cited passage relates to cursor speed during a pointing event, and a point lock mode that locks the keyboard *in* the pointing mode. Column 18, line 57-column 19, line 9. The third cited passage relates to macro expansion in the pointing mode and temporarily entering

the typing mode while in pointing mode. Column 19, line 52-column 20, line 5. None of these passages deal with moving a cursor for a pointing device to a pre-selected area on a display that is away from a text entry area in response to detecting entry into a text entry mode. As such, amended claim 17 and claims dependent thereon are not obvious.

Claim 26 was rejected as being obvious over Goodman in view of Franz, Liebenow, and Duffield. Claim 26 calls for a controller to detect entry into a text entry mode and to move the cursor of a pointing device to a pre-selected area on the display away from a text entry area in response to detecting entry into the text entry mode.

As explained above, Goodman does not specifically disclose a keyboard controller that detects entry into a text entry mode much less move a cursor of a pointing device in response thereto. For the reasons explained above with respect to claim 17, none of Franz, Liebenow, or Duffield cure the deficiency of Goodman.

Taken together, it is respectfully submitted that none of Goodman, Franz, Liebenow, or Duffield disclose or suggest all of the limitations of amended claim 26 or claims dependent thereon. Moreover, for reasons previously expressed, there is no suggestion or motivation to modify Goodman at least in view of Liebenow or Duffield. Thus, claim 26 and dependent claims are not obvious.

CONCLUSION

In view of the amendments and remarks herein, the application is believed to be in condition for allowance. The examiner's prompt action in accordance therewith is respectfully requested.

The commissioner is authorized to charge any additional fees, including extension of time fees, or credit any overpayment to Deposit Account No. 20-1504 (ITL.0567US).

Respectfully submitted,

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